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WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;
ALAMEDA COUNTY FEMALE
PRISONERS And Former Prisoners, JACLYN
MOHRBACHER, ERIN ELLIS, DOMINIQUE
JACKSON, CHRISTINA ZEPEDA, ALEXIS
WAH, AND KELSEY ERWIN, et al on behalf
of themselves and other similarly situated,

Plaintiffs,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) Jane ROEs, Nos. 1 – 25;
WELLPATH MANAGEMENT, INC., a
Delaware Corporation (formerly known as
California Forensic Medical Group) a
corporation; its Employees and Sub-
Contractors, and Rick & Ruth ROEs Nos. 26-
50; **ARAMARK CORRECTIONAL**
SERVICES, LLC, a Delaware Limited
Liability Company; its Employees and Sub-
Contractors, and Rick & Ruth ROES Nos.
51-75,

Defendants.

Case No.: 3:19-cv-07423 JSC

**DEFENDANT WELLPATH
MANAGEMENT, INC.'S
REQUEST FOR
CLARIFICATION OF THIS
COURT'S SEPTEMBER 29,
2023, DISCOVERY ORDER AT
ECF NO. 328**

Action Filed: November 12, 2019
Judge: Hon. Jacqueline Scott Corley
Ctrm: E—15th Floor

3:19-cv-07423 JSC

**DEFENDANT WELLPATH MANAGEMENT, INC.'S REQUEST FOR CLARIFICATION
OF THIS COURT'S SEPTEMBER 29, 2023, DISCOVERY ORDER AT ECF NO. 328**

Defendant Wellpath Management, Inc. (“Wellpath”) appreciates the Court’s September 29, 2023, Order regarding the parties’ current discovery dispute. However, Wellpath seeks clarification of September 29, 2023, Order as to the following issue: Will the Court please clarify which medical providers need to be identified? Many of the Plaintiffs received treatment for medical conditions that are not identified in the Fifth Amended Complaint or their discovery responses. This is why Wellpath objected to the interrogatories as being overbroad. Will the Court please clarify that to comply with ECF No. 328, Wellpath is only required to identify the providers who treated Plaintiffs for the medical conditions alleged in the Fifth Amended Complaint and/or medical conditions identified in Plaintiffs’ responses to written discovery and not any and all medical treatment they received during each of their incarcerations?

Respectfully submitted,

DATED: September 29, 2023

BERTLING LAW GROUP

/s/ Peter G. Bertling

Peter G. Bertling

Jemma Parker Saunders

Attorneys for Defendant

WELLPATH

Dated: October 2, 2023

